Law Office of Alice Bower Alice Bower 6421 Camp Bowie Blvd. Suite 300 Fort Worth, Texas 76116 (817) 737-5436 Telephone (817) 737-2970 Fax Attorney for Debtors

## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§ §	15-43524-MXM13
LINDA ISH	§	CV   DTTD 14
DEBTOR(S)	§	CHAPTER 13
	§	
HSBC BANK USA, NATIONAL ASSOC.	, §	Preliminary Hearing: 11/08/2018
ET AL	§	
	§	
MOVANT	§	Time: 9:30 a.m.
	§	
V.	§	
	§	
LINDA ISH and	§	
TIM TRUMAN, TRUSTEE	§	
RESPONDENTS	§	

## RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY FILED BY HSBC BANK USA, NATIONAL ASSOC., ET AL

## TO THE HONORABLE MARK X. MULLIN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, LINDA ISH, Debtor in the above styled and numbered cause and files this "Response to Motion for Relief from Automatic Stay" filed on behalf of HSBC BANK USA, NATIONAL ASSOC., ET AL, hereinafter referred to as ("Movant"), and in support hereof would respectfully show the Court as follows:

- 1. Debtor admits the allegations set forth in Paragraph 1 of Movant's Motion. However, Debtor maintains that she has had numerous health issues, which led to her refiling her case. Debtor has been in the current case for three years.
- 2. Paragraph 2 does not appear to contain factual allegations to which the Debtor can either admit or deny. To the extent that a response was sought the Debtor would deny all allegations contained in Paragraph 2 of Movant's Motion.

- 3. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 3 of Movant's Motion.
- 4. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 4 of Movant's Motion.
- 5. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 5 of Movant's Motion.
- 6. Paragraph 6 does not appear to contain factual allegations to which the Debtor can either admit or deny. To the extent that a response was sought the Debtor would deny all allegations contained in Paragraph 6 of Movant's Motion.
- 7. Debtor denies the allegations set forth in Paragraph 7 of Movant's Motion.
- 8. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 8 of Movant's Motion.
- 9. Debtor denies the allegations set forth in Paragraph 9 of Movant's Motion.
- 10. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 10 of Movant's Motion.
- 11. Debtor can neither admit nor deny and therefore denies the allegations set forth in Paragraph 11 of Movant's Motion.
- 12. Paragraph 12 does not appear to contain factual allegations to which the Debtor can either admit or deny. To the extent that a response was sought the Debtor would deny all allegations contained in Paragraph 12 of Movant's Motion.
- 13. Debtor denies the allegations set forth in Paragraph 13 of Movant's Motion.
- 14. Debtor denies the allegations set forth in Paragraph 14 of Movant's Motion.
- 15. Paragraph 15 does not appear to contain factual allegations to which the Debtor can either admit or deny. To the extent that a response was sought the Debtor would deny all allegations contained in Paragraph 15 of Movant's Motion.
- 16. Debtor denies the allegations set forth in Paragraph 16 of Movant's Motion. Debtor's home has greatly increased its value since Debtor filed her case.

WHEREFORE PREMISES CONSIDERED, Debtor prays the Court to deny all relief requested by Movant, and for such other and further relief the Court may deem Debtor justly entitled.

Respectfully submitted,

/s/ Alice Bower ALICE BOWER State Bar No. 15148500 6421 Camp Bowie Blvd. Suite 300 Fort Worth, Texas 76116 (817) 737-5436 Telephone (817) 737-2970 Fax Attorney for Debtors

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing response was served on the interested parties by electronic means, if available, and if not available, by First Class Mail, postage prepaid on this the 4th day of November, 2018.

/s/ Alice Bower Alice Bower